

FILED  
2011 FEB 16 PM 2:21  
CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD MICHAEL PERSA, and  
MATTHEW J. HOLLAND,

Defendants.

INDICTMENT

**1:11CR070**

CASE NO. \_\_\_\_\_

Title 18, §§ 2113(a) and  
2, United States Code

**JUDGE DOWD**

COUNT 1

The Grand Jury charges:

On or about November 13, 2010, in the Northern District of Ohio, Eastern Division,  
RICHARD MICHAEL PERSA and MATTHEW J. HOLLAND, defendants herein, did by force  
and violence and by intimidation take and cause to be taken from the person and presence of  
tellers and other employees at the US Bank, 2132 Brookpark Road, Cleveland, Ohio,  
approximately \$3,703.00 in monies belonging to and in the care, custody, control, management  
and possession of said bank, the deposits of which were then insured by the Federal Deposit  
Insurance Corporation, in violation of Title 18, Sections 2113(a) and 2, United States Code.

COUNT 2

The Grand Jury further charges:

On or about December 8, 2010, in the Northern District of Ohio, Eastern Division, RICHARD MICHAEL PERSA, defendant herein, did by force and violence and by intimidation take and cause to be taken from the person and presence of tellers and other employees at the US Bank, 200 Public Square, Cleveland, Ohio, approximately \$2,219.00 in monies belonging to and in the care, custody, control, management and possession of said bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, Section 2113(a), United States Code.

COUNT 3

The Grand Jury further charges:

On or about December 15, 2010, in the Northern District of Ohio, Eastern Division, RICHARD MICHAEL PERSA and MATTHEW J. HOLLAND, defendants herein, did by force and violence and by intimidation take and cause to be taken from the person and presence of tellers and other employees at the Key Bank, 6300 Brookpark Road, Cleveland, Ohio, approximately \$1,760.00 in monies belonging to and in the care, custody, control, management and possession of said bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, Sections 2113(a) and 2, United States Code.

COUNT 4

The Grand Jury further charges:

On or about December 22, 2010, in the Northern District of Ohio, Eastern Division, RICHARD MICHAEL PERSA and MATTHEW J. HOLLAND, defendants herein, did by force

and violence and by intimidation take and cause to be taken from the person and presence of tellers and other employees at the Fifth Third Bank, 7414 Broadview Road, Parma, Ohio, approximately \$5,145.00 in monies belonging to and in the care, custody, control, management and possession of said bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, Sections 2113(a) and 2, United States Code.

COUNT 5

The Grand Jury further charges:

On or about December 30, 2010, in the Northern District of Ohio, Eastern Division, RICHARD MICHAEL PERSA and MATTHEW J. HOLLAND, defendants herein, did by force and violence and by intimidation take and cause to be taken from the person and presence of tellers and other employees at the Key Bank, 3370 West 117th Street., Cleveland, Ohio, approximately \$5,070.00 in monies belonging to and in the care, custody, control, management and possession of said bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, Sections 2113(a) and 2, United States Code.

A TRUE BILL.

Original document -- Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.